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AM Retail Group, Inc. d/b/a DKNY*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NANDALYN REYES, an Individual,

Plaintiff,

vs.

AM RETAIL GROUP, INC., dba DKNY; a
Foreign Corporation; DOES 1 Through 25,
inclusive; and ROE CORPORATIONS 1
Through 25, inclusive,

Defendants.

Case No. 2:21-cv-02110-JAD-BNW

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Nandalyn Reyes ("Plaintiff"), through her counsel Kang & Associates, PLLC, and Defendant AM Retail Group, Inc. d/b/a DKNY ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall have a seven (7) day extension up to and including **Monday, December 20, 2021**, in which to file a response to Plaintiff's First Amended Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed her First Amended Complaint in state court on November 18, 2021.
2. Defendant's counsel accepted service of the First Amended Complaint on behalf of Defendant on November 29, 2021. Therein, the parties stipulated that Defendant's response to the First Amended Complaint would be due on December 13, 2021.
3. On November 29, 2021, Defendant removed the case to this Court.
4. Defendant's response to the First Amended Complaint is currently due on December 13, 2021.

1 5. Defendant requires additional time to investigate Plaintiff's allegations before
2 responding to the First Amended Complaint.

3 6. This is the first request for an extension of time for Defendant to file a response to
4 Plaintiff's First Amended Complaint.

5 7. This request is made in good faith and not for the purpose of delay.

6 8. Nothing in this Stipulation, nor the fact of entering to the same, shall have the
7 effect of or be construed as waiving any claim or defense held by any party hereto.

8 Dated this 13th day of December, 2021.

9 JACKSON LEWIS P.C.

KANG & ASSOCIATES, PLLC

10 /s/ Joshua A. Sliker

/s/ Kyle R. Tatum

11 Joshua A. Sliker, Bar No. 12493

Kyle R. Tatum, Bar No. 13264

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13 Las Vegas, Nevada 89101

Las Vegas, Nevada 89149

14 *Attorneys for Defendant*

Attorneys for Plaintiff

15 **ORDER**

16 IT IS SO ORDERED:

17 

18 United States Magistrate Judge

19 Dated: December 15, 2021

20 4861-7682-9190, v. 1